

DECLARATION OF ANDREA TAYLOR  
Pursuant to 28 U.S.C. §1746

I, Andrea Taylor declare as follows:

1. I reside in Edmonton, Alberta, Canada. I have used the name Andrea Milton in the recent past. The following facts are known to me personally and, if called as a witness, I could and would competently testify to them.
2. I have a business diploma in Operations Management from Durham College in Oshawa, Ontario, Canada. In late August 2009, I needed a job and saw a job posting on an online employment website for someone to assist with fraud detection. I forwarded my resume by email, using the name Andrea Milton. A man named Kevin with a company called Just Think Media called me and asked me to come in for an interview. The next day, I went to Just Think Media's offices, which are located on the second floor of a three-story office building on Sherwood Drive in Sherwood Park, a suburb of Edmonton. I met with Kevin Bassinet and a man named Szymon, whose surname I do not know. We met in the company's conference room. There were some products on display in the conference room, including a colon cleanse product, a tooth whitening product, and a weight loss product. Kevin explained that the company sold these products online and that the position they were looking for someone to ferret out fraudulent orders for these products. I was asked a few questions about my work experience and interests. That same week, I went back to the company for a second, perfunctory interview with Jesse Willms, the company's owner. I was hired within a day or two after the second interview, and I started work at Just Think Media less than one week later.
3. I observed that Just Think Media was an Internet technology website design company. Most employees did not have clearly defined job titles, though most of the employees were web designers. I worked in a room about the size of a large conference room with

1 about 11 or 12 other people. The room had desks, each with a computer, positioned  
2 back-to-back around the walls of the room, though Jesse Willms has a desk in the middle  
3 of the room. There were no dividers between desks. It was an open space. There was  
4 very little talking. Communications between staff occurred using an instant messaging  
5 system, although the web designers sometimes talked among themselves and joked  
6 around about the pages they were developing for Just Think Media products and the  
7 pictures that they found to use in the Just Think Media-designed websites.

- 8
- 9 4. Kevin Bazinet was my direct superior and handled some office manager type duties.  
10 Jesse Willms was the owner and clearly the boss. Szymon (LNU) was Jesse's right-hand  
11 man. When Jesse traveled for business, Szymon went along. The company also  
12 employed Jesse's sister, Kelsey, who seemed to have some office management duties. A  
13 man named Hernan (LNU) had customer service responsibility. A few weeks after I was  
14 hired, the company hired Brenda Gillam. She was responsible for certain customer  
15 service duties and Hernan was her supervisor. There were also a part-time accounting  
16 clerk, a receptionist, and a part-time payroll clerk. The web designers included a man  
17 named Sameer and a man named Jeff. There was a guy named Mike, but I do not know  
18 what his job duties were. He was not a web designer.
- 19
- 20 5. The company's business was selling products online through a network of seven major  
21 affiliates, most of whom had "sub-affiliates." The products were marketed through  
22 various advertisements disseminated by the affiliates or their sub-affiliates. These  
23 affiliates and sub-affiliates used Internet banners, sidebar advertisements, and pop-up  
24 advertisements that appeared on many unrelated websites frequented by consumers.  
25 When the consumer clicked on the banner ad, sidebar ad, or pop-up, their Internet  
26 browser was directed to a website designed by Just Think Media programmers and web  
27 designers. While I was there, the marketed products included a weight loss product  
28 (pills), a tooth whitener (tube of paste), and a colon cleansing product (pills). All of these

1 products were marketed through "free" trial offers. When a consumer saw the affiliate-  
2 placed ad on a website and clicked on it, the consumer's computer or mobile device with  
3 Internet access brought up the respective Just Think Media website. When there was a  
4 sale, that is, when the consumer provided his or her credit card information at the Just  
5 Think Media-designed website, the system identified which affiliate's advertisement led  
6 to the sale. For example, a consumer might see a pop-up advertisement for tooth  
7 whitener while visiting an unrelated website. When the consumer clicked on the pop-up,  
8 the consumer's internet session jumped to a Just Think Media website advertising a free  
9 trial of its tooth whitening product. If the consumer decided to try the free trial, he or she  
10 provided credit card information in order to pay certain shipping and other costs, which  
11 constituted a sale. All of the sales were made by credit card; there was no other way to  
12 pay.

- 13
- 14 6. My primary responsibilities were to review orders to ferret out those that were  
15 fraudulent. It is my understanding that affiliates and sub-affiliates received a percentage  
16 of each sale, so there was some incentive for them or their sub-affiliates to create phony  
17 sales. My job was to try to spot the bogus sales. I received very little training at the  
18 outset. Kevin Bassinet showed me the electronic data that the company received about  
19 each sale, and explained what to look for in terms of fraud detection. For example, using  
20 the company's electronic sales tracking system, I could see the details of all sales,  
21 including specifics for every product or service for which a consumer was being charged,  
22 as well as all of the information that a consumer provided, including the consumer's  
23 address, phone number, email address, and any comments. I could sort the database  
24 using any of these. Each affiliate and sub-affiliate was assigned a number in the system.  
25 I could also sort the sales information by product or by affiliate number.
- 26
- 27 7. On a daily basis, I sorted the sales data so that I could see which affiliate or sub-affiliates  
28 generated the most sales or leads that converted to sales. I then reviewed the sales

1 generated by the top 50 or so affiliates and sub-affiliates, by product, and by volume. For  
2 example, on a given day, I would look at the sales completed for the DazzleWhitePro  
3 trial offer and figure out which affiliates and sub-affiliates had the most sales by volume.  
4 I drilled down into the sales data to look for any indicia of fraudulent sales. I was  
5 attempting to spot bogus sales, presumably those entered by an affiliate or sub-affiliate  
6 interested in increasing its commissions.

7  
8 8. It is my understanding that multiple bogus sales can be entered via an Internet bot, a  
9 software application that runs automated tasks over the Internet, performing simple,  
10 repetitive tasks much more quickly than a human can. In this case, bots would load fake  
11 names, email addresses, shipping addresses, and so on, presumably to increase the  
12 commissions to the sub-affiliate who launched the bot. If I found multiple sales  
13 generated from the same affiliate involving the use of similar hotmail or other email  
14 addresses, such as "123@live.com," "456@live.com," and so on 10, or 20 or more times,  
15 I presumed those to be fraudulent orders.

16  
17 9. It is my understanding that after consumers submitted their credit card information, they  
18 were presented with an opportunity to answer a question about how they had learned of  
19 the free trial offer to which they had just responded. Thus, if there were several  
20 transactions in which consumers' responses to this question were typed in identically, I  
21 presumed those orders were fraudulent. For example, if the word "Google" was typed in  
22 all small case or all upper case letters, repeatedly, that was a red flag. I looked for any  
23 indications that sales were not made by random consumers ordering products from Just  
24 Think Media websites. If I could show that a sub-affiliate was entering fraudulent  
25 orders, I reported the sub-affiliate to the affiliate that brought the sub-affiliate onto the  
26 network. In the month of August 2009, I created a list of all of the fraudulent orders that  
27 I detected, by affiliate. A true and correct copy of that list is attached to this declaration  
28 as Attachment A. The column on the left is the number of fraudulent orders detected in

1 August 2009, the numbers under "affiliate" denote the subaffiliate responsible for the  
2 fraudulent orders, and the "product" column indicates the JTM product website where the  
3 sale transaction occurred. Although I was told to detect and report these fraudulent  
4 orders to the affiliates, I was not asked to cancel the fraudulent orders.

5  
6 10. I was also instructed to find any indication that a sale was "incentivized" and to cancel  
7 those orders. For example, the products were not to be sold on Craigslist, but only  
8 through Just Think Media websites. If consumers responded to the question about how  
9 they learned of the free trial offer by noting that they had learned of it on Craigslist, I  
10 canceled the sale. Similarly, the products could not be sold at websites like  
11 www.freebies.com, where the consumer would have an incentive, other than interest in  
12 the product, to purchase. Sub-affiliates that used incentivized sales were "shut down"  
13 and prohibited from generating further sales (or receiving commissions on sales) with  
14 regard to that particular product, though they were permitted to continue to generate sales  
15 for the other Just Think Media products.

16  
17 11. Sometimes, rather than answering the question regarding where the customer learned  
18 about the product, customers posted comments like "please stop charging my credit  
19 card," or "please cancel this subscription." In some instances, customers wrote entire  
20 paragraphs complaining about the product and advising that they no longer wanted it.

21  
22 12. Initially, when I determined that an order was fraudulent, I emailed the information about  
23 that order to the affiliate responsible for the sub-affiliate that generated the order. In my  
24 email, I explained that we had determined the order was fraudulent and wanted a credit  
25 for the amount that we had paid that affiliate for that order. After several weeks, I  
26 streamlined the process. First, we set up a new email address for me, which was  
27 fraud@justthinkmedia.com. I also created an invoice so that I could list the fraudulent  
28 sales, the respective sub-affiliate numbers, and the total credits that were due to Just

1 Think Media as a result of the fraudulent orders. In addition, I created a spreadsheet  
2 listing each affiliate and the fraudulent orders, as well as the reason they were considered  
3 fraudulent. I emailed the spreadsheets to the affiliates on a daily basis and the invoice on  
4 a weekly basis. It is my understanding that these credits were deducted from the amounts  
5 due from Just Think Media to the affiliates for the sales they generated, or were paid  
6 directly to Just Think Media if Just Think Media had already paid the commissions on  
7 those sales. Some of these bogus transactions may have eventually been disputed and  
8 charged back, but I do not know how that was accounted for at the company.

9  
10 13. Along with the invoice listing fraudulent sales, I sent a standard email message advising  
11 the affiliate that its offending sub-affiliate was no longer allowed to generate sales for the  
12 product for which they had generated fraudulent sales. The subaffiliate was, however,  
13 allowed to continue to generate sales for Just Think Media's other products. The  
14 verbiage in this email message was in use at the time that I arrived and Kevin instructed  
15 me to continue to use it. I observed that once we sent such a letter to an affiliate about  
16 one of its sub-affiliates, we did not receive further orders generated by that sub-affiliate  
17 for that product. A true and correct copy of such an email is attached to this declaration  
18 as Attachment B. Attachment B includes email correspondence between me and one of  
19 the affiliates. I do not know who at Just Think Media was making the "customer  
20 confirmation call backs" referenced in this email message. I have no idea if those "call  
21 backs" were made or not.

22  
23 14. All of the company's products were sold through "free" trial offers. It was not possible,  
24 however, for a customer to receive the advertised free trial offer without also being billed  
25 for at least two other products, known as "add-ons." For example, if a consumer wanted  
26 to get a free trial supply of the colon cleanse product, the consumer also had to buy  
27 something called "World Book" or "World Health," and was charged an amount less than  
28 \$10 for shipping of the colon cleanse product, as well as two recurring monthly charges

1 for the two additional products. These additional products were not mentioned until the  
2 consumer got to the "order page" where the consumer entered credit card information to  
3 pay the shipping costs for the free trial. On the order page, there were fine print  
4 disclosures regarding the recurring monthly charges for the additional two products or  
5 add-ons, and the fact that unless the consumer canceled, the consumer would continue to  
6 receive product and be charged for it on a recurring monthly basis. Apparently, some  
7 people did not see or read these disclosures. Other times these costs were disclosed in  
8 the "terms and conditions" that a customer agreed to in the process of ordering the free  
9 trial. These additional products, which were actually additional websites designed by  
10 Just Think Media, contained information on specific topics, such as diet and exercise.  
11 Login information for accessing these websites was generally included with the  
12 consumer's receipt.

13  
14 15. Toward the end of my tenure at Just Think Media, I was asked to review websites that  
15 were not yet posted, to make sure that the hyperlinks worked, to check for typographical  
16 errors, and so on. Initially, I found all sorts of grammatical and spelling errors, which I  
17 highlighted. I was told, I believe by Szymon, not to worry about spelling and  
18 grammatical errors because the editor would do that, and because the sites would only  
19 run for a short period of time. I was told to check that the hyperlinks to the ordering  
20 pages worked. None of the websites stayed up long, but the same verbiage and format  
21 was used repeatedly.

22  
23 16. Near the end of my tenure at Just Think Media, I was asked to assist with processing  
24 product returns. These were products returned by customers. Some days there were no  
25 returns and some days there were as many as 20 or 30. Sometimes the packages had  
26 letters enclosed asking the company for refunds or requesting that the recurring monthly  
27 charges to their credit cards stop. I read letters in which the customers explained that  
28 they did not want the product. Some customers complained that the product had




1 damaged their gums (tooth whitener). I also read letters in which consumers explained  
2 that they had tried to cancel the recurring charges through the company's customer  
3 service system, but were unsuccessful. These customers asked that the company stop  
4 charging their credit card. Sometimes there were letters from attorneys enclosed with the  
5 product returns. If a customer wanted to cancel, I was instructed by Kevin to go into the  
6 system and cancel the order. Kevin also instructed me to open packages and return  
7 unopened product to the back holding area. I informed Mike, the fellow who handled  
8 this mail, of the name and address of the consumer who had returned product, and  
9 whether the account was still active in the system. I do not know how consumers knew  
10 to send returns to Just Think Media's Sherwood Park address. That address is not on any  
11 of the websites or on the product packaging, so far as I know.

- 12  
13 17. I continued to look for work while I was employed at Just Think Media. In September  
14 2009, I got another job, and I advised Jesse Willms that I was leaving. I left in late  
15 September 2009. I worked at Just Think Media for approximately one month.

16  
17 I verify under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct.

19  
20 Dated: 6 November 2010

  
\_\_\_\_\_  
Andrea Taylor



From: Andrea Milton  
To: Jesse Willms  
Subject: Re: Today  
Date: Tuesday, September 01, 2009 12:54:50 PM  
Attachments: August Credit Requests.xlsx

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Hi Jesse,

Here is the month end collection sheet for August. I have emailed out final numbers today to all networks, and you will note that ClickBooth has already paid a bunch of their credits. I will be following up on this and will give you status updates.

I will be starting the new invoicing process with the mail outs starting on Friday. Hopefully this way we can receive payments weekly!

Thanks,

Andrea

On Tue, Sep 1, 2009 at 8:21 AM, Jesse Willms <[jd.jesse@yahoo.com](mailto:jd.jesse@yahoo.com)> wrote:  
Both

--- On **Tue, 9/1/09, Andrea Milton** <[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)> wrote:

From: Andrea Milton <[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)>  
Subject: Re: Today

To: "Jesse Willms" <[jd.jesse@yahoo.com](mailto:jd.jesse@yahoo.com)>  
Date: Tuesday, September 1, 2009, 7:14 AM

Do you want just what is outstanding?

On Tue, Sep 1, 2009 at 8:06 AM, Jesse Willms <[jd.jesse@yahoo.com](mailto:jd.jesse@yahoo.com)> wrote:

Thank you, can you get me a list of everyone who was fraud in august (like we had in july)?

Jesse

--- On **Mon, 8/31/09, Andrea Milton** <[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)> wrote:

From: Andrea Milton <[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)>  
Subject: Today  
To: "Jesse Willms" <[jd.jesse@yahoo.com](mailto:jd.jesse@yahoo.com)>  
Date: Monday, August 31, 2009, 4:01 PM

Here is what I did today:

Attachment A

Reconciled credit memo's received from ClickBooth against our records to ensure complete payment was received.  
Worked with ClickBooth on new fraud from one of their networks due to increase in fraud from several of their subs.  
Went through top 50 looking for incentive ordering....everything was fine.  
Created fraud spreadsheet, emailed networks.  
Worked with Santosh on several csv file problems that needed to be fixed in order to work on fraud.  
Continued website testing for Szymon.

--

Andrea Milton  
Quality Assurance  
[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)

msn: [andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)  
aol: andreaajtm

780.416.0211 office  
780.416.0218 fax

JustThink Media Inc.  
[www.justthinkmedia.com](http://www.justthinkmedia.com)

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--  
Andrea Milton  
Quality Assurance  
[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)

msn: [andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)  
aol: andreaajtm

780.416.0211 office  
780.416.0218 fax

JustThink Media Inc.  
[www.justthinkmedia.com](http://www.justthinkmedia.com)

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--  
No virus found in this incoming message.

Checked by AVG - [www.avg.com](http://www.avg.com)

Version: 9.0.733 / Virus Database: 271.1.1/2650 - Release Date: 01/27/10 12:36:00

Quantity	Affiliate	Product
<b>ADVALIENT</b>		
9	5998	DazzleWhitePro
13	5789	DazzleWhitePro
12	5129	AcaiBurnExtreme
37	4516	PremuimAcaiBurn
12	4516	dazzlewhitepro.com
9	4944	AcaiBurnExtreme
9	5183	ultrapurecleanse
8	5547	ultrapurecleanse
9	5183	ultrapurecleanse
9	4944	acaiburnextreme.com
17	1836	acaiforcemax.com
79	1836	acaiburnextreme.com
9	5372	acaismilplus
4	1836	dazzlesmilepro
84	4516	dazzlesmilepro
14	3795	acaismilplus.com
8	4279	ultracleanseplus.com
8	5993	dazzlesmilepro.com
<b>Azoogole</b>		
5	40763	Acaiburnextreme
1	38173	dazzlewhitepure
10	33450	pureliftultra
10	1926	dazzlesmilepro.com
<b>Bloosky</b>		
11	1827	acaiforcemax.com
12	1952	dazzlesmilepro.com
1	1952	dazzlesmilepro.com
<b>ClickBooth</b>		
25	CD14119_49692	dazzlewhitepro
20	CD18280	dazzlewhitepro
24	CD51370_513663	naturepure
15	CD61344	AcaiBurnExtreme
9	CD96869	dazzlewhitepro
16	CD97568	acaiburnedge
12	CD94276	pureresv
9	CD91523	naturepure
134	affiliace	acaiburndetox
21	cd82193_	acaiburndetox
8	CD10613	acaiburndetox.com
18	CD51099_	naturepurecleanse
10	CD82193_	naturepurecleanse

PAID

PAID

PAID

11	CD96869	dazzlewhitepro.com	PAID
8	ndemandaffiliates	acaiburnedge.com	PAID
8	ndemandaffiliates	pureresv.com	PAID
8	CD52466	naturepurecleanse	PAID
99	affiliace	acaisslimdetox.com	PAID
8	CD10613	acaisslimdetox.com	PAID
23	CD82193	dazzlesmilepro.com	PAID
11	CD82193_	acaisslimedge.com	PAID
8	CD96869	dazzlesmilepro.com	PAID
9	ndemandaffiliates	purerezver.com	PAID
8	CD51099_340	acaiforcemax.com	
9	CD51099_1363	acaiforcemax.com	
15	CD51099_1527	acaiforcemax.com	
8	CD51099_1593	acaiforcemax.com	
9	CD51099_1639	acaiforcemax.com	
13	CD87156	premiumacaisslim.com	
8	CD91412	acaiforcemax.com	
6	CD10613	purerezver.com	PAID
6	CD10613	purerezver.com	
15	CD51099_	acaiforcemax.com	PAID
9	CD51099_	acaiforcemax.com	
6	CD52466	ultracleanseplus.com	PAID
2	CD52466	ultracleanseplus.com	
5	CD87156	acaisslimedge.com	PAID
3	CD87156	acaisslimedge.com	

**Copeac**

8	29625	naturepurecleanse
9	23671	acaiburnextreme

**CX**

11	31853	dazzlesmilepro
11	29952	premiumacaisslim
1	10582	dazzlewhitepro
1	21938	pureliftcream
12	29039	dazzlesmilepro
2	29952	premiumacaisslim.com
3	29952	premiumacaisslim.com
8	33246	premiumacaisslim.com

**eAdvertising**

19	401574	AcaiBurnExtreme
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**Market Leverage****CREDITS ON SEPT 1 INVOICE**

1	cd1664	PremiumAcaiBurn
9	cd13944	acaiburnplus
9	flux	premiumacaislim
8	cd87156	acaislimedge
17	cd16854	acaislimplus
12	cd15001	premiumacaislim
9	cd6741	premiumacaislim
12	CD17805	premiumacaislim.com
9	CD19413	acaiforcemax.com
9	flux	acaiforcemax.com
10	CD13994	acaislimplus.com

**Neverblue**

15	60488	acaiforcemax
199	57768	premiumacaiburn
10	11392	premiumacaiburn
10	11380	ultrapurecleanse
26	119252	premiumacaiburn
12	61300	AcaiBurnExtreme
22	107739	PremiumAcaiBurn
28	113880	ultrapurecleanse
35	69613	AcaiBurnExtreme
18	115558	PremiumAcaiBurn
12	99181	PremiumAcaiBurn
9	107739	naturepurecleanse
17	107739	acaislimplus
14	107739	acaiforcemax
28	107739	acaiburnplus
11	55697	ultracleanseplus.com
13	119252	acaiforcemax.com
4	119252	acaiforcemax.com
2	119252	acaiforcemax.com
4	119252	acaiforcemax.com
8	119886	ultracleanseplus.com
9	126248	purerezver.com

From: lrosen@medatrust.com  
To: Fraud; Mahshid Melsami  
Subject: RE: Notice of Fraudulent Transactions  
Date: September-22-09 8:25:55 AM

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Hi Andrea,

Only 17 leads were scrubbed for this affiliate, since that's the amount that we tracked, we cannot scrub 18.

Thanks,

Lauren

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From: andrea@justthinkmedia.com [mailto:andrea@justthinkmedia.com] On Behalf Of Fraud  
Sent: Monday, September 21, 2009 3:17 PM  
To: Lauren Rosen; Mahshid Melsami  
Subject: Notice of Fraudulent Transactions

Advaliant

Attention: Lauren Rosen

**Re: Notice of Fraudulent Transactions**

Please find attached our fraud transaction reports for your network. After conducting standard customer confirmation call backs, during which a thank you call is placed to the customer within 60 minutes of the order being placed, the reported customers denied making a purchase on our site(s). This information is combined with occurrence frequency in relation to the total number of generated leads through which offending affiliates are identified.

As we are notifying you within twenty four (24) hours, it is anticipated that the affiliate(s) listed in the report shall be removed from our offer(s) and that any payments made to the said affiliate(s) shall be refunded via credits logged at the time of this notice and then subtracted from the final invoice at the end of the month.

Please acknowledge receipt of this notice as soon as possible by replying to [fraud@justthinkmedia.com](mailto:fraud@justthinkmedia.com)

—  
Andrea Milton  
Quality Assurance  
[andrea@justthinkmedia.com](mailto:andrea@justthinkmedia.com)

Attachment B

JTM 10116